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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**NOTICE OF AGENDA
FOR HEARING ON SEPTEMBER 26, 2023 AT 1:00 P.M. (EASTERN TIME)**

I. PLAN CONFIRMATION AND FINAL DISCLOSURE STATEMENT APPROVAL

1. Third Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) [Docket No. 1609].

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd, 1st and 2nd Floors, Hamilton, NJ 08691.

2. Disclosure Statement Relating to the Third Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Solicitation Version) [Docket No. 1310].

Previously Filed Plans

- A. Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 22].
- B. First Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 875].
- C. Second Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1132].
- D. Third Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1300].
- E. Third Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Solicitation Version) [Docket No. 1309].
- F. Third Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Technical Modifications) [Docket No. 1564].

Plan Supplement Documents

- A. Notice of Filing of Plan Supplement [Docket No. 1443].
- B. Notice of Filing of Amended Plan Supplement [Docket No. 1467].
- C. Notice of Filing of Second Amended Plan Supplement [Docket No. 1585].

Confirmation Responses Received

- A. Verified Objection of Creditor John A. Javes to Confirmation of the Third Amended Joint Chapter 11 Plan [Docket No. 1473].

Status: Withdrawn [Docket No. 1516].

- B. The Joint Liquidators' Limited Objection to Confirmation of Third Amended Joint Chapter 11 Plan of Reorganization of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1474].

Status: Resolved.

- C. Objection of Cameron Wyatt, Proposed Securities Class Action Lead Plaintiff, to (I) Confirmation of the Debtors' Proposed Chapter 11 Plan and (II) Final

Approval of the Disclosure Statement in Connection Therewith [Docket No. 1475].

Status: This objection has not been resolved.

- D. Objection of the United States Trustee to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1476].

Status: Partially resolved.

- E. Limited Objection of Ankura Trust Company, LLC to Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1478].

Status: Resolved.

- F. Limited Objection and Reservation of Rights of the U.S. Securities and Exchange Commission to Confirmation of Debtor's Joint Chapter 11 Plan [Docket No. 1487].

Status: Partially Resolved.

- G. Objection of the FTX Debtors to (I) Confirmation of the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates and (II) Final Approval of the Debtors' Disclosure Statement [Docket No. 1488].

Status: Resolved.

- H. Limited Objection of the Chubb Companies to Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1519].

Status: Resolved.

- I. Objection to Debtors' Notice of Filing Technical Modifications to Third Amended Joint Chapter 11 Plan of BlockFi and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and to Confirmation of the Plan [Docket No. 1600].

Status: This objection has not been resolved.

Confirmation Brief and Declarations in Support of Confirmation

- A. Debtors' Memorandum of Law in Support of (I) Final Approval of the Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) an Order Confirming the Third Amended Joint

Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1608].

- B. Declaration of Mark A. Renzi, Chief Restructuring Officer of BlockFi Inc., in Support of (I) Final Approval of the Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Confirmation of the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1582].
- C. Declaration of Brett Witherell, Managing Director of Berkeley Research Group, LLC, in Support of Final Approval of the Disclosure Statement for, and Confirmation of, the Debtors' Chapter 11 Plan [Docket No. 1583].
- D. Declaration of Scott D. Vogel, Independent Director and Member of the Special Committee of the Board of Directors of BlockFi Inc., in Support of (I) Final Approval of the Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Confirmation of the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1584].
- E. Declaration of James Daloia of Kroll Restructuring Administration LLC Regarding the Solicitation and Tabulation of Votes on the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1607].

Proposed Confirmation Order

- A. *Proposed* Findings of Fact and Conclusion of Law, and Order (I) Approving the Disclosure Statement Relating to Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code on a Final Basis and (II) Confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Technical Modifications) [Docket No. 1586].
- B. *Revised Proposed* Findings of Fact and Conclusion of Law, and Order (I) Approving the Disclosure Statement Relating to Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code on a Final Basis and (II) Confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Technical Modifications) [Docket No. 1610].

Disclosure Statements, Disclosure Statement Orders, Solicitation Affidavits

- A. Disclosure Statement Relating to the First Amended Joint Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 874].
- B. Disclosure Statement Relating to the Second Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1133].
- C. Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1301].
- D. Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures, (III) Approving the Forms of Ballots and Notices in Connection Therewith, and (IV) Scheduling Certain Dates With Respect Thereto [Docket No. 1306].
- E. Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Solicitation Version) [Docket No. 1310].
- F. Affidavit of Service of Solicitation Materials [Docket No. 1573].

Other Related Documents

- A. Stipulation and Agreed Order Between U.S. Securities and Exchange Commission and Debtors to Forego Receiving Distribution from Debtor's Bankruptcy Estates [Docket No. 1161].
- B. Application in Lieu of a Motion in Support of a Motion in Support of Entry of the Stipulation and Agreed Order Between Certain State Governmental Regulatory Claimants and Debtors to Forego Receiving Distributions from Debtors' Bankruptcy Estates [Docket No. 1526].
- C. Notice of filing of Settlement Agreement Between the FTX Debtors and BlockFi Debtors [Docket No. 1605].
- D. Statement of the Official Committee of Unsecured Creditors in Support of Confirmation of Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1606].

II. OTHER MATTERS GOING FORWARD

- 1. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors,

(II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No 4].

Responses Received

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No. 232].

Related Documents

- A. Joinder of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No. 234].
- B. Debtors' Response to U.S. Trustee's Objection to Debtors' Consolidation and Redaction Motion [Docket No. 275].
- C. Supplemental Declaration of Mark A. Renzi in Support of Debtors' Consolidation and Redaction Motion [Docket No. 276].
- D. Declaration of Brian Tichenor of Moelis & Company, LLC in Support of Debtors' Consolidation and Redaction Motion and Declaration in Support of Debtors' Sealing Motion [Docket No. 277].
- E. Reply in Opposition to the United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No. 278].

F. Statement of the Ad Hoc Committee of Wallet Account Holders in Support of the Debtors' Redaction Motion [Docket No. 282].

G. Debtors' Amended Response to U.S. Trustee's Objection to Debtors' Consolidation and Redaction Motion [Docket No. 337].

H. Supplement to Debtors' Amended Response to U.S. Trustee's Objection to Debtors' Consolidation and Redaction Motion [Docket No. 1594].

Status: This matter is going forward.

2. Motion of Proposed Lead Plaintiff Cameron Wyatt for Entry of an Order Modifying the Stipulated Injunctive Relief Order [Adv. Docket No. 20].

Responses Received

- A. Debtors' Opposition to Motion of Proposed Lead Plaintiff Cameron Wyatt for Entry of an Order Modifying the Stipulated Injunctive Relief Order [Adv. Docket No. 28].

Related Documents

- A. Proposed Lead Plaintiff Cameron Wyatt's Reply in Support of the Motion for Entry of an Order Modifying the Stipulated Injunctive Relief Order [Adv. Docket No. 29].

Status: This matter is going forward.

Dated: September 26, 2023

/s/ Michael D. Sirota

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